

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

MICHELLE PILLON,
Plaintiff,

v.

SELECT PORTFOLIO SERVICING, INC.
CITIBANK, N.A., AS TRUSTEE FOR
WAMU ASSET-BACKED CERTIFICATES,
WAMU SERIES 2007-HE2 TRUST,
Defendants.

Civil Action No. 1:17-cv-00450-JJM-PAS

**DEFENDANTS' MOTION TO ENLARGE TIME
TO SERVE RESPONSES TO PLAINTIFF'S WRITTEN DISCOVERY**

Defendants Select Portfolio Servicing, Inc. and Citibank, N.A., as Trustee, hereby move to enlarge the deadline to serve their responses to Plaintiff's pending written discovery requests up to and including October 18, 2019. The current response deadline is October 9, 2019. In support of the extension, Defendants state as follows:

1. Plaintiff served late requests for production of documents, requests for admissions, and interrogatories on both Defendants. Plaintiff's discovery is broad and expansive. For example, Plaintiff served 41 requests to admit on Citibank, as Trustee, and 48 on Select Portfolio Servicing. Defendants require additional time to finalize and execute written objections and responses to all discovery requests, despite the proportionality problems. Defendants are concerned that Plaintiff will declare the responses untimely, and, with respect to the requests to admit, assert that all allegations are deemed admitted and binding. Therefore, Defendants seek a few additional days to complete and serve responses to the discovery

2. Plaintiff will not suffer any undue prejudice from the requested extension.

Defendants do not otherwise seek to delay the action, and the current discovery completion deadline of November 4, 2019 per the Court's amended Scheduling Order will remain unaffected.

For the foregoing reasons, Defendants Select Portfolio Servicing, Inc. and Citibank, N.A., as Trustee, request this Court to extend the deadline for serving responses to Plaintiff's written discovery up to and including October 18, 2019.

Respectfully Submitted,

**SELECT PORTFOLIO SERVICING, INC. and
CITIBANK, N.A., AS TRUSTEE,**

By their attorneys,

/s/ Peter F. Carr, II

Peter F. Carr, II (R.I. #5343)

ECKERT SEAMANS CHERIN & MELLOTT, LLC

Two International Place, 16th Floor

Boston, MA 02110-2602

T: (617) 342-6800

F: (617) 342-6899

pcarr@eckertseamans.com

Dated: October 8, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those parties which are as non-registered participants.

/s/ Peter F. Carr, II

Peter F. Carr, II

Dated: October 8, 2019